

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ROBERT BOWERS

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Criminal No. 18-292

****UNDER SEAL****

**JOINT PROPOSED *VOIR DIRE* PROCEDURES AND
JOINT PROPOSED JURY QUESTIONNAIRE**

The parties, through undersigned counsel, submit the attached Joint Proposed *Voir Dire* Procedures and Joint Proposed Jury Questionnaire. The parties further state as follows:

1. The Court ordered the parties to submit Joint Proposed *Voir Dire* Procedures and a Joint Proposed Jury Questionnaire no later than June 13, 2022. (ECF 723.)
2. Pursuant to the Court's order, the parties have met, conferred, and identified areas of agreement and disagreement.
3. Exhibit A is the Joint Proposed *Voir Dire* Procedures, which indicates the procedures on which the parties agree and disagree.
4. Exhibit B is the Joint Proposed Jury Questionnaire, which indicates the questions on which the parties agree and disagree.
 - a. Where the parties disagree on a question, the defense version appears in the left column and the government version appears in the right column. In some instances, the parties dispute whether the question should be included in the questionnaire at all.

b. In approximately seventeen questions, the only difference in the defense version and the government version is the scope of the individuals identified in the question. For example, the defense version of Question 18 states, “Have you, an immediate family member or anyone close to you, ever served in the military . . . ?” The government version of the same question states, “Have you, or a member of your immediate family or household, ever served in the military . . . ?” For these questions, the disputed language is highlighted in yellow.

c. Where the parties agree on a question, the question appears in one undivided row across both columns.

d. Finally, with respect to the structure of the questionnaire, the parties do not always agree on the order of topics, namely, Questions Concerning Punishment.

5. For the Court’s consideration, in addition to the Joint Proposed Jury Questionnaire, both parties are submitting “clean” versions of their respective proposed jury questionnaires as Exhibit C (Defense Proposal) and D (Government Proposal).

6. The parties intend to file briefing in support of their respective positions on the disputed questions and procedures within 30 days, or as otherwise ordered by the Court.

Respectfully submitted,

/s/ Judy Clarke

Judy Clarke
Clarke Johnston Thorp & Rice, PC

/s/ Michael N. Burt

Michael N. Burt
Law Offices of Michael Burt, PC

/s/ Michael J. Novara

Michael J. Novara
First Assistant Federal Public Defender

/s/ Elisa A. Long

Elisa A. Long
Supervisory Assistant Federal Public Defender

COUNSEL FOR ROBERT BOWERS

CINDY K. CHUNG
United States Attorney

s/ Troy Rivetti

Troy Rivetti
Assistant U.S. Attorney
PA ID No. 56816

s/ Soo C. Song

Soo C. Song
Assistant U.S. Attorney
DC ID No. 457268

s/ Eric G. Olshan

Eric G. Olshan
Assistant U.S. Attorney
IL ID No. 6290382

s/ Julia Gegenheimer

Julia Gegenheimer
Special Litigation Counsel
Civil Rights Division
NY ID No. 4949475